

Inspection Notes

TO: Multi-Service File

FROM: Cathy Altman

DATE: March 12, 2010

George Strobel, Jeff Smith, Laura Marshall, Matt Walbridge (DSW) and I conducted an inspection of Multi-Service on Friday, March 12, 2010. Joe LaMantia and Mel Tatman represented Multi-Service at different times during the inspection. The purpose of the inspection was to determine the operational status of Multi-Service and to inventory the materials and waste on site. The status of Multi-Service's sale to another business is unclear. According to Mr. Tatman, Multi-Service ceased laundry operations on March 5, 2010. Mr. Tatman stated Multi-Service's intent to clean up the tanks, the waste and the waste water treatment unit (WWTU)

The WWTU is shut down. Crown Solutions was on site on March 9, 2010, to remove some equipment that belonged to them. (Crown Solutions had notified me on March 5, 2010, that they had ceased working for Multi-Service on February 26, 2010, and they would be removing their equipment the following week) Mr. LaMantia had sampled the waste water and sent the sample to Test America for analysis. United Waste Water, who was on site to gather information on Multi-Service's waste disposal needs, will use the sample results to determine what, if any, waste they can manage at their facility.

We were unable to determine the amount of waste being stored in the two 22,000 gallon equalization (EQ) tanks, the 6,500 gallon floor pit, 500 gallon waste water tank, 3,000 gallon chemical mix tank or the DAF system which are all associated with the WWTU. The EQ tanks did not have any sight glass, the only way to determine the amount of waste was to climb an extension ladder propped between the two EQ tanks. Besides the safety issue with the ladder, the floor area around the tanks is covered with a thick layer of sludge from when the outlet fitting on tank #1 recently failed (referenced in the March 3, 2010, inspection). From previous inspections we were told by Multi-Service that the 6,000 gallon hazardous waste tank outside is half full with waste.

Information from Crown Solutions suggests tank #1 has approximately 1,400 gallons of sludge with the rest of the tank filled with "water" – waste solvent and oils that would normally be run through the WWTU. Tank #2 has approximately 4,750 gallons of sludge and 4,500 gallons of "water". The floor pit may be half sludge and half "water." It is unclear the amount of sludge and "water" in the trenching system. The DAF system was over half full. The sludge from all processes of the WWTU has not been cleaned out since 2007. According to Crown Solutions, the failure of the pipe from Tank #1 occurred because Multi-Service attempted to operate the WWTU on their own.

The hazardous waste (HW) load removed on February 26, 2010, has not been delivered to Greencastle in Indiana. Mr. Tatman thought the load was with Midwest Environmental Trucking. Multi-Service has not had another hazardous waste shipment since the February 26, 2010, load. We observed thirty-nine (39) hazardous waste totes and twenty-two (22) hazardous waste drums on site.

There are a large number of containers storing textiles; one dumpster was full of rags. It is unclear whether any of the textiles on site are clean or not. According to Mr. Tatman, the rags in the dumpster have been laundered. However, there was an overwhelming solvent smell associated with these rags. Because of the strong odor, Mr. Strobel contacted the dumpster owner (Rumpke) to inform them of the contents. According to Rumpke, Multi-Service has not been paying their bills, so Rumpke will not be picking up the dumpster. Mr. Strobel expressed our concern about the rags in the dumpster to Mr. Tatman. Mr. Tatman again, insisted that the rags in the dumpster were laundered.

There are eleven (11) trucks on site, three (3) are trailers and eight (8) are box trucks. Loading dock:

- Box truck being loaded with drums of what appeared to be clean rags (don't have plate information, Multi-Service information on the side)
- Trailer (number 54) - do not know whether it is empty or not

In grass to the southeast of Building:

- Box truck (plate # PS112A) - locked
- Box truck (plate #PCP5477) - contained five (5) 55 gallon drums

In the grass and pavement to the southwest of Building:

- Trailer (no plate, yellow and white) - facing south, almost full with containers, some of which were torn into by an animal
- Box truck (no plate, Multi-Service information on back) – empty, facing south
- Box truck (plate #PDQ5812) - empty, facing south, next to red dumpster
- Box truck (plate #PDQ5991) - almost full with containers, facing north
- Trailer (plate #TPB9994) - almost full with containers, facing north

- Box truck (don't have plate information, Multi-Service information on the side) – empty, facing south, stored between trailer (plate #TPB9994) and approximately twelve (12) pallets of drums
- One box trailer facing south (plate #PDB1691) almost full with containers.

Multi-Service has several containers of product materials used in the laundering process, the WWTU or in the boiler room – partial list below.

WWTU area:

- Sodium Hydroxide solution – 300 gallon tote in front of WWTU, approximately half full
- Sulfuric Acid – 300 gallon tote in front of WWTU, approximately half full
- Ferric Chloride – approximately 250 gallon tote in front of WWTU, contents unknown
- Sodium Hydroxide solution – 300 gallon tote in front of Ferric Chloride tote, appears empty
- Sodium Hydroxide solution – 5 gallon bucket, next to empty Sodium Chloride tote, appears full
- Open 55 gallon drum at east end of WWTU, half full with unknown liquid

Laundering process:

- Dober Base Oil, solvenated degreaser – 55 gallon drum, almost empty
- Super Clean 4932 – 55 gallon drum, approximately half full
- 2 – 55 gallon drums with corrosive labels, white powder on top, contents unknown
- Aluminum Sulfate Solution – approximately 5,000 gallon tank at northwest side of laundry machines, approximately 18 inches of liquid in tank
- Liquid Alkaline Commercial Laundry Builder – approximately 4,000 gallon tank, contents unknown
- Tank – approximately 4,000 gallons, black bottom and gray/white top, unknown contents

Boiler area:

- Chevron Gear Compound EP ISO 460 – 55 gallon drum, approximately half full
- Boiler Chemicals – 5 – 5 gallon buckets (Hydrex Boiler Dispersant, Hydrex Oxygen Scavenger, and Hydrex Boiler Treatment)

The Tank Room is located in the southeast corner of the building. The Tank Room consists of the following:

- Dirty solvent tank – 12,185 gallons, approximately 1,000 gallons of waste in tank
- Clean solvent tank – 12,185 gallons, sight glass appears to show the tank empty
- Used oil tank – 3,800 gallons, contents unknown
- Clean solvent receiver – 1,268 gallons – approximately 1,000 gallons of waste in tank
- Sludge cooling tank – 300 gallons – contents unknown
- Sump pit and pump – 400 gallons – waste was visible in sump, but amount unknown
- Tank vent carbon absorption unit – size unknown
- Secondary water/solvent separator – 400 gallons, empty

Multi-Service has a used oil extraction unit that ceased operating in the December 2009. The unit appears to have a small amount of used oil stored in it. The trenching system associated with the unit however appears full with used oil and other debris.

Multi-Service still has 39 hazardous waste totes and 22 hazardous waste drums on site – of those, 21 totes and 14 drums continue to exceed the 90-day storage limit.

The following is a list of the totes and drums that are exceeding the 90-day storage:

Tote Date	90-Day Storage Date	As of March 12, 2010, Number of Days Exceeding the 90-Day Storage Limit

October 19, 2009	January 17, 2009	54
October 30, 2009	January 28, 2010	43
November 3, 2009	February 1, 2010	39
2 Totes – November 4, 2009	February 2, 2010	38
November 5, 2009	February 3, 2010	37
November 9, 2009	February 7, 2010	33
2 Totes – November 10, 2009	February 8, 2010	32
2 Totes – November 11, 2009	February 9, 2010	31
November 16, 2009	February 14, 2010	26
November 17, 2009	February 15, 2010	25
November 18, 2009	February 16, 2010	24
November 20, 2009	February 18, 2010	22
November 24, 2010	February 22, 2010	18
November 30, 2009	February 28, 2010	12
December 1, 2009	March 1, 2010	11
December 2, 2009	March 2, 2010	10
December 7, 2009	March 7, 2010	5
December 9, 2009	March 9, 2010	3
Drum Date:		
9 Drums – October 2, 2009	December 31, 2009	71
October 30, 2009	January 28, 2010	43
2 Drums – November 11, 2009	February 9, 2010	31
2 Drums – December 2, 2009	March 2, 2010	10

We observed 39 totes and 22 drums of hazardous waste stored onsite at Multi-Service during the inspection. The following is a list of dates on the totes and drums:

October 19, 2009	November 18, 2009	December 29, 2009
October 30, 2009	November 20, 2009	January 4, 2010
November 3, 2009	November 24, 2009	January 6, 2010
November 4, 2009	November 30, 2009	January 7, 2010
November 4, 2009	December 1, 2009	January 12, 2010
November 5, 2009	December 2, 2009	January 13, 2010
November 9, 2009	December 7, 2009	January 19, 2010
November 10, 2009	December 9, 2009	January 26, 2010
November 10, 2009	December 14, 2009	February 9, 2010
November 11, 2009	December 15, 2009	February 16, 2010
November 11, 2009	December 21, 2009	February 23, 2010
November 16, 2009	December 22, 2009	March 9, 2010
November 17, 2009	December 23, 2009	1 unlabeled tote

9 drums dated – October 2, 2009
1 drum dated – October 30, 2009
2 drums dated – November 11, 2009
2 drums dated – December 2, 2009
1 drum dated – December 28, 2009
1 drum dated – January 6, 2010
1 drum dated – January 13, 2010
1 drum dated – January 14, 2010
1 drum dated – January 26, 2010
1 drum dated – February 9, 2010
1 drum dated – February 16, 2010
1 drum dated – February 24, 2010

Sharon Vaughn from the City of Dayton's Pretreatment Division was also onsite during the inspection. Ms. Vaughn discussed the flow meter that was placed in the sanitary sewer (just inside Multi-Service's gate). We opened a different sanitary sewer lid on Multi-Service's property, a yellow cord tied onto a semi-trailer extended into the sewer. According to Mr. Tatman, normally at the end of the rope was an absorbent boom for catching oil in the discharge. There was no absorbent boom at the end of the rope. Mr. Tatman removed the rope from the sewer. The small flow we observed in the manhole appeared to be clear and the flow existed in spite of no operations at the facility. The flow appeared to be similar to the amount observed during the March 3, 2010, inspection.